

EXHIBIT I

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By Email
June 2, 2017

Sean P. Carter, Esquire
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Cozen O'Connor, P.C.
1650 Market Place
Philadelphia, PA 19103-7301

Re: *In re Terrorist Attacks*, No. 03-MDL 1570

Sean and Scott,

Enclosed please find the document indexes for Dr. Al-Turki, Dr. Al-Obaid, and Dr. Naseef (combined in one file), and for Dr. Basha. These are in Word format, and can be readily exported to Excel.

Since the first three defendants were officers of MWL (all are now retired), the responsive documents are in the possession of the MWL, and were produced by the MWL as part of its merits document production. For Dr. Basha, who is retired from the IIRO, the responsive documents are in the possession of the IIRO, and were produced by the IIRO as part of its merits document production.

We understand that the individual defendants do not themselves have documents relating to their work at the charities, as those documents remained with the charities after their retirement. Further, since they travelled on official passports, which the government retained after each trip, they do not have personal possession of those passports.

All four defendants continue to maintain their objections to the jurisdictional discovery document requests as asserted in their initial responses on November 11, 2013, including that many of the requests exceed the scope of jurisdictional discovery, and are not relevant to determining personal jurisdiction pursuant to the Second Circuit's remand decision. Subject to and without waiving those objections, a subset of the MWL's and IIRO's document production

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is or may be responsive to the jurisdictional discovery document requests directed to these four individuals, as set forth on the attached indexes.

We have tried to be overinclusive in indexing the documents, as many documents (or ranges of documents) can be responsive to multiple jurisdictional discovery document requests, given the broad and overlapping nature of those requests. However, not all of the MWL and IIRO documents were responsive to the jurisdictional discovery document requests, so these indexes only include those that we determined were responsive to those requests.

For Drs. Al-Turki, Al-Obaid, and Naseef, note that part of the early MWL production was Bates-stamped with "IIRO" numbers even though it consisted of MWL documents (*i.e.*, the January 10 and 18, 2012 productions). The subset of the MWL documents indexed herein, comprising at least 80,050 documents (or groups of closely related documents), are responsive to at least 51 of the jurisdictional discovery document requests directed to each of those three defendants.

For Dr. Basha, the subset of the IIRO documents indexed herein, comprising at least 52,600 documents (or groups of closely related documents), are responsive to at least 45 of the jurisdictional discovery document requests directed to him.

Finally, there is one remaining tranche of MWL and IIRO documents that is being reviewed and indexed, and we hope to have those reviewed for the individual defendants' jurisdictional discovery document requests within one week of the completion of the MWL's and IIRO's final production.

Sincerely,

/s/ Alan

Alan R. Kabat

Enc.

cc: MDL 1570 counsel